

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ELIZABETH PAYNE

VS.

FRIENDSHIP WEST
BAPTIST CHURCH

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NO. 3:09-CV-0595-B

DEFENDANT'S WITNESS LIST

A. Probable Witnesses:

1. Church Witnesses:

Dr. Frederick Haynes III, Veta Holt, Elizabeth Moffitt, Rickey Hill,
Tonya Neal, Lora Clack, Danielle Ayers, Debra Moten,
Brianna Parker, Cornell Towns.

Address for all is 2020 Wheatland Road, Dallas, Texas 75232-4517.

Haynes, Holt, Moffitt, Hill, Neal, Clack, Ayers and Moffit will testify respecting Plaintiff's poor work habits, job performance, mistakes, absences, unauthorized communication with the media, failure to attend monthly leadership meetings, failure to report in-between Sunday services, failure to attend staff meetings and the termination decision made by Dr. Haynes

Moten, Parker and Towns will testify as to conflicts with Plaintiff.

Deposed?

Dr. Haynes, Holt, E. Moffitt and Tonya Neal were deposed by Plaintiff.

Estimated length of direct examination:

1-2 hours: Dr. Haynes

45 min.—1 hour: Holt, C. Moffitt, Hill and Neal

30-45 min.—Clack, Ayers and Towns

2. Other Probable Witnesses:

Patrick West

4420 W. Vickery Blvd., Suite 100, Fort Worth, Texas 76107

Can testify as to custody, support and contempt issues with Plaintiff.

Deposed?

Not deposed to Defendant's knowledge

Estimated length of direct examination: 30 min.

Fred Payne

1505 Iroquois Circle, Carrollton Texas 75006

Can testify as to emails between himself and Dr. Haynes and events following Plaintiff's termination.

Deposed?

Not deposed to Defendant's knowledge

Estimated length of direct examination: 30 min.

Jack Akana, Jr., Atiya Bottom and Marcus King

Address for Akana and Bottom is 2020 Wheatland Road, Dallas, Texas 75232-4517. Address for King is 463 Whitney, Cedar Hill, Texas 75104

Akana and Bottom will testify about their dates of employment at Friendship West and the birth of their child. King will testify that he was fired from Friendship West for having an affair.

Deposed?

Not deposed to Defendant's knowledge

Estimated length of direct examination: 30 min. each

Cathy Moffitt

202 S. Tyler Street, Dallas, Texas 75208

Can testify about similar matters as the church witnesses.

Deposed?

Not to Defendant's knowledge

Estimated length of direct examination: 20 min.

B. Possible Witnesses:

Deborah Pritchett and Stephanie Canady

Pritchett: 3537 Silverwood Dr. Carrollton, Texas 75006

Canady: 2308 Springfield Dr. Mesquite Texas 75181

Pritchett: Will testify about representing Payne in custody issues and that her legal fees were paid, at least in part, by Friendship West.

Canady will testify to telephone consultation with Payne, who stated that if she took her case, she would get Dr. Haynes to do favors for her.

Deposed?

Not deposed to Defendant's knowledge.

Estimated length of direct examination: 20-40 min. total.

Jay Gromley

10111 N. Central Expressway, Dallas, Texas 75231

Reporter who can testify that Plaintiff recanted her story about the affair with Rev. Jeremiah Wright and admitted lying.

Deposed?

Not deposed to Defendant's knowledge.

Estimated length of direct examination: 30 min.

Willa Freeman

2020 W. Wheatland, Dallas, Texas 75232-4517

Will testify that Plaintiff instructed all media calls to come to her.

Deposed?

Not deposed to Defendant's knowledge.

Estimated length of direct examination: 20 min.

C. Character Witnesses:

Mayor Tom Leppert
1500 Marilla, Room 5EN
Dallas, Texas 75201

Senator Royce West
2612 Main Street, Suite 100
Dallas, Texas 75226

Rev. Zan Holmes
6034 Boca Raton Dr.
Dallas, Texas

Hon. Craig Watkins
District Attorney
133 Riverfront Blvd.
Dallas, Texas 75207

Willis Johnson
621 N.W. 6th Street
Grand Prairie, Texas 75050

Pastor Russell Jones
Brookhollow Baptist Church
Dallas, Texas

All the above witnesses will testify as to Dr. Frederick Haynes' good character and reputation for truth and veracity.

Respectfully submitted,

/s/ *Faith S. Johnson*

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Irving, Texas 75039
214-401-3100
214-401-3105 (fax)

Counsel for Defendant

CERTIFICATE OF SERVICE

I have served a true copy of this motion on Hon. Susan E. Hutchinson, Counsel
for Plaintiff, via the ECF system, on this 19th day of May, 2010.

/s/ *Faith S. Johnson*

Faith S. Johnson